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December 20, 2010

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Advanced Communication Provisions of the Twenty-First Century
Communications and Video Accessibility Act of 2010*, CG Docket No. 10-
213

Dear Ms. Dortch:

On Friday, December 17, 2010, Rebecca Schwartz, Telecommunications Industry Association (TIA), Brian Scarpelli, TIA; Mary Brooner, TIA; Paul Schomburg, Panasonic; Scott Kelley, Motorola; and Jon Beamer, Nokia; met with Allen Barda, Senior Attorney, Mobility Division, Wireline Telecommunications Bureau (WTB); Jennifer Flynn, Legal Advisor to the Office of Chairman Julius Genachowski; David Hu, Attorney, Broadband Division, WTB; Elizabeth Lyle, Special Counsel for Innovation, WTB; Karen Peltz Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau; Renee Roland Crittendon, Deputy Chief, WTB; and Ziad Sleem, Associate Chief, Wireless Policy, WTB.

During this meeting, TIA discussed the provision of the Twenty-First Century Communications and Video Accessibility Act (the Act) which allows the Commission to identify technical standards to be used as a safe harbor mechanism to facilitate compliance with the Act.¹ TIA, an American National Standards Institute (ANSI)-accredited standards development organization, has long supported efforts to increase accessible technology through voluntary industry standards.²

¹ 47 U.S.C. § 617(e)(1)(D).

² See Comments of Telecommunications Industry Association, CG Docket No. 10-213 (filed Nov. 22, 2010).

In the course of the meeting, TIA and Commission staff discussed TIA's standard development process,³ and it was noted that standards are typically a minimum threshold with two types of standards existing – technical and performance-based. Technical standards are generally technology-specific, while performance-based standards are focused on the end result. Allowing for the use of accredited, voluntary, consensus-based, and, to the highest degree possible, internationally harmonized standards in safe harbor regulations will give clarity and guidance to manufacturers, service providers, and consumers.

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, a copy of this submission is being provided to the meeting attendees. Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,

/s/ Rebecca Schwartz

Rebecca Schwartz

cc: Allen Barda
Jennifer Flynn
David Hu
Elizabeth Lyle
Karen Peltz Strauss
Renee Roland Crittendon
Ziad Sleem

³ TIA's Engineering Manual describes in detail its technical standard development processes. TIA Engineering Manual (Oct. 2009) *available at* <http://www.tiaonline.org/standards/procedures/manuals/engineering.cfm>.